

Marianne Dugan (OSB # 932563)
Internet e-mail address mdugan@mdugan.com
259 E. 5th Ave., Suite 200-D
Eugene, OR 97401
(541) 338-7072
Fax no. 866-650-5213
Of Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EFRAIN REYNAGA,

No. 6:11-cv-06282-MC

Plaintiff,

PLAINTIFF'S PROPOSED VERDICT FORM

v.

ROSEBURG FOREST PRODUCTS,

Defendant.

Plaintiff submits the following proposed verdict form.

Respectfully submitted October 2, 2017.

s/ Marianne Dugan
Marianne Dugan, OSB # 932563
Attorney for Plaintiff
259 E. 5th Ave., Ste 200-D
Eugene, Oregon 97401
(541) 338-7072
Fax (866) 650-5213
mdugan@mdugan.com

1. Did the defendant create a hostile work environment for plaintiff on the basis of his race or national origin?

Yes ____ No ____

2. Has the plaintiff proved by a preponderance of the evidence that the plaintiff's race, color, or national origin was the sole reason for the defendant's decision to discharge the plaintiff?

Yes ____ No ____

If the answer to Question 2 is "yes," proceed to Question 4. If the answer to Question 2 is "no," proceed to Question 3.

3. Has the plaintiff proved by a preponderance of the evidence that the plaintiff's race, color, or national origin was a motivating factor in the defendant's decision to discharge the plaintiff?

Yes ____ No ____

4. Has the plaintiff proved by a preponderance of the evidence that the plaintiff's complaint about discrimination was the sole reason for the defendant's decision to discharge the plaintiff?

If the answer to Question 4 is "yes," proceed to Question 6. If the answer to Question No. 4 is "no," proceed to Question 5.

5. Has the plaintiff proved by a preponderance of the evidence that the plaintiff's complaint about discrimination was a motivating factor in the defendant's decision to discharge the plaintiff?

Yes ____ No ____

6. Has the plaintiff proved by a preponderance of the evidence that the plaintiff's race, color, or national origin was the sole reason for the defendant's decision to break the lock on plaintiff's locker?

Yes ____ No ____

If the answer to Question 6 is "yes," proceed to Question 8. If the answer to Question 6 is "no," proceed to Question 7.

7. Has the plaintiff proved by a preponderance of the evidence that the plaintiff's race, color, or national origin was a motivating factor in the defendant's decision to break the lock on

plaintiff's locker?

Yes _____ No _____

If your answers to Questions 1 through 7 are all "No," then your deliberations are completed and you should not answer any other questions. Your Presiding Juror should sign this Verdict form and inform the bailiff that the jury has reached its verdict. If your answer to one or more those questions is "Yes," then proceed to Question 8.

8. What are plaintiff's economic damages, if any?

\$ _____

9. What are plaintiff's non-economic damages, if any?

\$ _____

10. Did defendant act maliciously, or in reckless disregard of plaintiff's rights?

Yes _____ No _____

11. If you answered "Yes" to Question 10, what amount of punitive damages should be awarded against defendant?

\$ _____

Dated this _____ day of _____ 2017.

PRESIDING JUROR